

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

DECLARATION OF MARICARMEN
C. PEREZ-VARGAS IN SUPPORT OF
LCR 37 SUBMISSION

I, Maricarmen C. Perez-Vargas, am over the age of 18, have personal knowledge of all
the facts stated herein and declare as follows:

1. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant Mozilla
Corporation's Responses to Plaintiff's First Set of Interrogatories and Requests for Production
dated September 10, 2024.

2. Attached hereto as **Exhibit 2** is a true and correct copy of Defendant Laura
Chambers' Responses to Plaintiff's First Set of Interrogatories and Requests for Production dated
September 10, 2024.

DECLARATION OF MARICARMEN C. PEREZ-VARGAS IN
SUPPORT OF OF LCR 37 SUBMISSION - 1
60606-003

STOKES LAWRENCE, P.S.
1420 FIFTH AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101-2393
(206) 626-6000

1 3. Attached hereto as **Exhibit 3** is a true and correct copy of Defendant Winifred
2 Mitchell Baker's Responses to Plaintiff's First Set of Interrogatories and Requests for Production
3 dated September 10, 2024.

4 4. Attached hereto as **Exhibit 4** is a true and correct copy of Defendant Dani
5 Chehak's Responses to Plaintiff's First Set of Interrogatories and Requests for Production dated
6 September 10, 2024.

7 5. Attached hereto as **Exhibit 5** is a true and correct copy of an email dated January
8 1, 2025 and attachment from Maricarmen Perez-Vargas to Counsel regarding the parties January
9 21, 2025 Meet and Confer.

10 6. Attached hereto as **Exhibit 6** is a true and correct copy of an email and
11 attachment dated January 24, 2025 from Alexandira Cates to Plaintiff's Counsel regarding
12 Plaintiff's Counsel's letter dated January 9, 2025, the January 21, 2025 meet and confer, and
13 Plaintiff's Counsel's email dated January 23, 2025.

14 7. Attached hereto as **Exhibit 7** is a true and correct copy of an email dated February
15 10, 2025 from Alexandira Cates to Plaintiff's Counsel.

16 8. Attached hereto as **Exhibit 8** is a redline of the Western District of Washington's
17 Model ESI Agreement against the Parties agreed upon ESI Agreement (Dkt # 20).

18 9. Attached hereto as **Exhibit 9** is a true and correct copy of an email dated
19 November 12, 2024 and attachment from Maricarmen Perez-Vargas to Counsel regarding
20 additional search terms.

21 10. Attached hereto as **Exhibit 10** is a true and correct copy of an email dated
22 December 13, 2024 and attachment from Alexandria Cates regarding additional search terms.
23
24

1 11. Attached hereto as **Exhibit 11** is a true and correct copy of the written Reason of
2 Termination provided by Mozilla Corporation effective September 1, 2024 executed by Carlos
3 Torres.

4 I declare under penalty of perjury under the laws of the United State of America that the
5 foregoing is true and correct

6 DATED this 8th day of April, 2025

7 STOKES LAWRENCE, P.S.

8
9 By: /s/Maricarmen Perez-Vargas
Maricarmen Perez-Vargas